

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In

Re:

Case No.: 18-22689-rdd  
(Chapter 13)

Eve E Mory AKA Eve Mary Maddux

Assigned to:  
Hon. Robert D. Drain  
Bankruptcy Judge

Debtor.

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**LIMITED OPPOSITION TO DEBTOR'S MOTION TO DISMISS**

I, Courtney R. Williams, Esq., am an attorney duly licensed to practice law in the Courts of this State and in the United States Bankruptcy Court for the Southern District of New York and hereby state as follows:

1. My office filed a motion for relief on behalf of BSI Financial Services, Inc. as servicer for US BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES II TRUST AND A DELAWARE STATUTORY TRUST ("Secured Creditor"), a Secured Creditor of the above-referenced Debtor on May 14, 2018 to terminate the automatic stay in this case with respect to the real property commonly known as 97 1st Avenue, Nyack, NY 10960 ("Property" or "Mortgaged Premises") and obtain *in rem* relief as to the Property such that any further filings by Eve E Mory AKA Eve Mary Maddux, or any other person or entity with an interest in the Property shall not operate as an automatic stay against the Secured Creditor and its successors and/or assigns.

2. The motion for relief from stay (docket 10) and amended notice of motion (docket 11) is scheduled to be heard by this Court on July 25, 2018 at 10:00 am.

3. The Chapter 13 Debtor made a motion to dismiss the bankruptcy case on July 5, 2018 (docket 24) which is scheduled to be heard on July 11, 2018 at 9:55 am.

4. Secured Creditor respectfully requests that the Debtor's motion to dismiss be adjourned to a date on or after July 25, 2018 at 10 am, which would allow the motion for relief to be heard.

5. Secured Creditor is making this request to allow its motion to be heard because the motion requests prospective *in rem* relief from stay based on Debtor's multiple bankruptcy filings, pursuant to §362(d)(4)(B).

WHEREFORE, the Secured Creditor respectfully requests the adjournment of the Debtor's motion to dismiss case, together with such other and further relief as the Court deems just and equitable.

DATED: July 10, 2018  
Williamsville, New York

A handwritten signature in cursive script, appearing to read "Courtney R. Williams".

Courtney R. Williams, Esq.  
GROSS POLOWY, LLC  
Attorneys for Secured Creditor  
BSI Financial Services, Inc. as servicer for US BANK  
TRUST NATIONAL ASSOCIATION, AS TRUSTEE  
OF THE IGLOO SERIES II TRUST AND A  
DELAWARE STATUTORY TRUST  
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